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10 *Attorneys for Defendant State of California,
acting by and through the California Highway
Patrol (erroneously sued as "State of California")
and Michael Bell*

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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17	EDGAR SOLIS,	5:23-cv-00515-HDV-JPR
18	Plaintiff,	DEFENDANTS' THIRD AMENDED WITNESS LIST
19	v.	Date: February 18, 2025
20	COUNTY OF RIVERSIDE; STATE OF CALIFORNIA; SALVADOR WALTERMIRE; and DOES 1-10, inclusive,	Time: 9:00 a.m.
21		Courtroom: 10D
22	Defendants.	Judge: The Honorable Hernan D. Vera
23		Trial Date: February 18, 2025
24		Action Filed: 2/02/2023
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1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 Defendants State of California, acting by and through the California Highway
3 Patrol, and Michael Bell hereby serve the following list of witnesses who may be
4 called during trial. Defendants reserve the right to supplement or amend this list.
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6 Witness's 7 Name*, Title, 8 Affiliation (If 9 Relevant)	10 Summary of 11 Testimony/Why 12 Testimony is Unique	13 Direct 14 Exam 15 (Hours)	16 Cross 17 Exam 18 (Hours)	19 Dates of 20 Testimony
21 Michael Bell, 22 Defendant, 23 CHP Officer	24 Officer Bell is the 25 defendant and will 26 testify about his 27 interactions with 28 Plaintiff, training and experience with the CHP.	1.25		
21 M. Vargas, 22 Lieutenant, 23 CHP San 24 Gorgonio Pass	25 Stationed at San 26 Gorgonio Pass Area 27 Office, Field 28 Operations. Involved in post-shooting investigation and knowledge of Defendant Bell's tactical training.	45 minutes	45 min	
21 D. Harris, 22 Sergeant, CHP 23 San Gorgonio 24 Pass	25 Stationed at San 26 Gorgonio Pass Area 27 Office, Field Sergeant 28 and knowledge of Defendant Bell's tactical training.	45 minutes	45 min	
21 C. Hamilton, 22 Lieutenant, 23 CHP Border 24 Division CIIT	25 CHP Critical Incident 26 Investigation Team, 27 Leader. Involved in 28 CHP critical incident investigation of the incident involving use of force on Plaintiff.	1 hour	1 hr	
21 J. Kawanaka, 22 Sergeant, CHP 23 Border 24 Division CIIT	25 CHP Critical Incident 26 Investigation Team, 27 Lead Administrative 28 Investigator. Involved in CHP critical incident investigation of the incident involving use of force on Plaintiff.	45 minutes	45 min	

	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
1	Daniel Moody, Detective	Riverside County Sheriff Department involved in the subsequent scene control or incident investigation and plaintiff's blood sample.	45 minutes	45 min	
2	J. Manjarrez, Detective	Riverside County Sheriff Department officials. Collected white bag of powdery substance from plaintiff's car suspected fentanyl and blood sample.	30 minutes	30 min	
3	A. Ditfurth, Deputy	Riverside County Sheriff Department official involved in the incident investigation. Surveillance video from 642 Taschner Drive and plaintiff's firearm forensic analysis.	30 minutes.	30 min	
4	Daniel Cline, Deputy	Riverside County Sheriff Department official involved in the incident investigation, obtained pictures, DNA swab, and Scanner data.	20 minutes	20 min	
5	Jennifer Jernegan, Lead Forensic Evidence Supervisor	Riverside County Sheriff Department officials involved in the incident investigation.	20 minutes	20 min	
6	Yesika Alvarado, Forensic Evidence Technician	Riverside County Sheriff Department official involved in the incident investigation. Captured pictures of scene, bullet holes and charted plaintiff's firearm.	40 minutes	40 min	

	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
1	A. Carey, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Obtained pictures of scene and plaintiff in hospital and first aid supplies and clothing.	20 minutes	20 min	
2	Venderfees, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Obtained pictures of pursuit termination at 632 Taschner Drive and point of rest of plaintiff's car and carport damage.	20 minutes	20 min	
3	Esteban Carranza, Investigator	Riverside County District Attorney's Investigator involved in the criminal investigation of the incident.	30 minutes	30 min	
4	J. Gonzalez, Lieutenant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent scene control or incident investigation.	30 minutes	30 min	
5	D. Maddox, Sergeant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent incident investigation.	30 minutes	30 min	
6	G. Gomez, Detective	Hemet Police Department Officer involved in the incident investigation.	20 minutes	20 min	
7	Amy Lim and/or Custodian of	Riverside University Hospital laboratory sample collection of	15 minutes	15 minutes	

	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
1	Records	blood from Plaintiff at hospital.			
2	Kristen Steward, M.S., D-ABFT-FT	Bio-Tox Laboratories Personnel involved in the testing and analysis of blood obtained from Plaintiff.	30 minutes	30 min	
3	Ola Bawardi, M.S.	Bio-Tox Laboratories Personnel involved in the testing and analysis of blood obtained from Plaintiff.	30 minutes	30 minutes	
4	Greg Meyer, Captain (Ret.)	Police Practices Expert will explain POST standards from basic law enforcement training and use of force tactics applicable to facts of this case.	2 hours	1 hr, 15 min – 1 hr 30 min	
5	Parris Ward, Forensic Video Analyst	Forensic video/audio analyst. Will testify regarding his assessment of BWC footage and security cameras near the shooting location and information that can be derived in relation to incident shooting.	1 hour	45 min	
6	Ronald Kvitne, M.D.	Board certified orthopedic surgeon medical expert will testify about his review and analysis of plaintiff's medical records as they pertain to Plaintiff's injuries including further treatment.	45 minutes	30-40 min	
7	Michael Ritter, M.D.	Emergency Medicine expert will testify about his review and analysis of plaintiff's Toxicology drug results positive for methamphetamine and PCP and other	1 hour	45 min	
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1	Witness's 2 Name*, Title, Affiliation (If Relevant)	3 Summary of Testimony/Why 4 Testimony is Unique	5 Direct Exam (Hours)	6 Cross Exam (Hours)	7 Dates of Testimony
8	9	10 medical records pertaining to 11 Plaintiff's injuries.	12	13	14
15	16 Leslie 17 Martinez	18 Resident of the 19 property where the incident occurred who heard yelling and gunshots.	20 minutes	20 min	
21	22 Marlene Sue 23 Biggs	24 Resident who observed 2-3 officers chase a male adult and heard gunshots	25 minutes	26 20 min	
27	28 Jose Jesus Rodriguez	29 Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	30 minutes	31 20 min	
32	33 Ana 34 Rodriguez	35 Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	36 minutes	37 20 min	
38	39 Liliana 40 Rodriguez	41 Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	42 minutes	43 20 min	
44	45 Pearo 46 Rodriguez	47 Resident who provided surveillance video from camera mounted to front of residence	48 minutes	49 20 min	
50	51 Florina Maria 52 Mandujano	53 Resident who provided surveillance	54 minutes	55 20 min	

1	Witness's 2 Name*, Title, Affiliation (If Relevant)	3 Summary of Testimony/Why 4 Testimony is Unique	5 Direct Exam (Hours)	6 Cross Exam (Hours)	7 Dates of Testimony
8	9	10 video from camera 11 mounted to front of 12 residence	13	14	15
16	17 Thomas Jordan	18 Resident who 19 provided surveillance 20 video from camera 21 mounted to front of residence	22 15 minutes	23 15 min	24
25	26 Nidia Santana	27 Resident who 28 provided surveillance video from camera mounted to front of residence	29 15 minutes	30 15 min	31
32	33 Richard Contla	34 Resident who heard a crashing sound and observed the suspect jump over an east wall. Then heard one of the officers yell, “He’s got a gun” followed by numerous gunshots and shouting. Mr. Contla recognized suspect, having seen him in the area before the incident.	35 30 minutes	36 30 min	37
38	39 Kathy Lynn Cassel	40 Resident of the area where the suspect collided with the Kia Sorrento causing damage to the Kia, support post for the parking stall awning and block wall	41 20 minutes	42 20 min	43

1 Dated: January 28, 2025

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California
4 DONNA M. DEAN
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s/ Tammy Kim

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10 California") and Michael Bell*

11 *Indicates that witness will be called only if the need arises.

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